

1. On November 5, 2019 the Government files a request for an Order *to comply with financial disclosures prior to sentencing* in which a “Financial Statement form OBD 500” was included to be furnished by the Defendants. See, Docket entry 214.

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2. On November 6, 2019 this Honorable Court issued an ORDER Granting Docket 214, and specifically issuing an order for a “COMPLIACE DUE BY 11/13/2019” (Governments Request for an Order *to comply with financial disclosures prior to sentencing*). See, Docket entry #215.
3. As Today’s date Defendants Sheila Judith Quinones-Santos [1] and Felipe Soto-Gonzalez [3] did not file their financial disclosures (Financial Statement form OBD 500), as required by this Honorable Court on its November 6, 2019 ORDER (Docket entry #214), they also didn’t fill any request for any extension of time to comply with this Court Order.
4. The compliance with these financial statements by the Defendants is of utmost importance to avoid assets transfer or disappearance due the fact that there is information that the Defendants utilized bank accounts outside the United States and/or opened accounts outside the United States using and on the name of unwound identities including but not limited to a Panama Financial Institution named “Netbanking Banreservas” to hide the moneys that they obtained from the victims in the instant case through a bank fraud conspiracy.

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5. Those delays by the Defendants are obstructing victims' rights to recover or know the whereabouts of their stolen moneys and causing additional attorney's fees that at the end of the instant case nobody knows that can be recovered.

WHEREFORE, it is very respectfully requested from this Honorable Court to enter an ORDER to impose economic sanctions in favor of the Victims and against Defendants Sheila Judith Quinones-Santos [1] and Felipe Soto-Gonzalez [3] for not complying with the term specified to provide their financial disclosures (Financial Statement form OBD 500), as required by this Honorable Court on its November 6, 2019 ORDER (Docket entry #214), and/or to issue the order or orders necessary to enforce the remedies and rights requested herein.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, today November 15, 2019.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 15, 2019 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties.

At San Juan, Puerto Rico, November 15, 2019.

S/JOSE FERNANDO IRIZARRY

USDC-PR 208504

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